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**BEFORE THE ARIZONA CORPORATION COMMISSION**

WILLIAM A. MUNDELL  
Chairman  
JIM IRVIN  
Commissioner  
MARC SPITZER  
Commissioner

IN THE MATTER OF GENERIC INVESTIGATION)  
ON INDUSTRY PETITION FOR APPROVAL OF )  
AN NPA RELIEF PLAN FOR THE 520 NPA )  
\_\_\_\_\_ )

DOCKET NO. T-00000F-99-0641  
DECISION NO. \_\_\_\_\_  
ORDER

Open Meeting  
February 13 and 14, 2001  
Phoenix, Arizona

**BY THE COMMISSION:**

Competition in the local telephone market, and the increasing demand for telephone numbers to provide second lines, fax machines, modems, wireless service and new enhanced services has resulted in a projected exhaust of the 520 area code in late-2001 (NANPA April, 2000 analysis, updated October 6, 2000). The 520 area code was established in 1995 for all locations outside of the Phoenix metropolitan and suburban area when the first exhaust of the 602 area code occurred.

FINDINGS OF FACT

**I. BACKGROUND AND PROCEDURAL HISTORY**

**A. State Proceedings**

1. On November 8, 1999, the North American Plan Administrator (“NANPA”) Lockheed Martin IMS (currently known as NeuStar, Inc. [“NeuStar”]) on behalf of the Arizona Telecommunications Industry (“Industry”) filed a Petition for Approval of a NPA Relief Plan for the 520 Numbering Plan Area (NPA). In its petition the Industry estimates that without NPA relief the supply of central office codes will exhaust in late 2001.

2. The Industry was unable to reach consensus<sup>1</sup> on a final relief plan and asked the Commission to approve one of two proposed relief plans for the 520 NPA. The two proposed Industry relief plans are:

<sup>1</sup> Consensus is established when substantial agreement has been reached among interest groups participating in the consideration of the subject at hand. ... Substantial agreement means more than a simple majority, but not necessarily unanimity., INC97-0414-016, November 13, 2000.

1 a geographic split with the Tucson/Nogales areas retaining the 520 NPA, or an all-services overlay for the  
2 entire geographic area encompassed by the 520 NPA.

3 3. On March 6, 2000, Commission Staff requested NANPA schedule a conference call with the  
4 Industry in an effort to arrive at an Industry consensus on a single relief plan. In response to this request  
5 NANPA scheduled a conference call for April 19, 2000. Following a review of the two proposed relief plans  
6 the Industry reached consensus on an overlay covering the entire geographic area presently served by the 520  
7 area code as the Industry recommended relief plan for the 520 NPA.

8 4. On May 8, 2000, Commission Staff requested that NANPA update the plan that was filed with  
9 its Petition to reflect the subsequent activity by the Industry and the consensus recommendation that was  
10 arrived at. On June 1, 2000, NANPA filed an Addendum to its petition in the above-captioned proceeding  
11 to notify the Commission of the Industry's consensus decision to recommend an all-services overlay as the  
12 method of relief for the 520 NPA.

13 5. On June 10, 2000, the Tucson rate center was consolidated from seven rate centers to one  
14 expanded rate center in an effort to conserve NXXs. The local calling area for Tucson consumers was not  
15 changed by this consolidation.

16 6. On June 14, 2000, Commission Staff invited affected telecommunications service providers  
17 and other interested parties to submit written comments to the Commission on the Industry proposed overlay  
18 relief plan. Parties were requested to file written comments on or before June 30, 2000, and reply comments  
19 on or before July 14, 2000. Initial Comments were filed by AT&T Communications of the Mountain States,  
20 Inc. (AT&T"), Cox Arizona Telecom, L.L.C. ("Cox"), Citizens Mohave Cellular ("Mohave Wireless"),  
21 WorldCom, Inc. ("WorldCom") and U S WEST Communications, Inc., n/k/a/ Qwest Corporation. Citizens  
22 Utilities Company ("Citizens") filed comments prior to Staff's request. Reply Comments were filed by Cox  
23 and WorldCom.

24 7. On November 10, 2000, NANPA responded to a Staff request to analyze an additional relief  
25 alternative. This alternative modified the Industry split alternative by removing the Miami, Globe and San  
26 Carlos rate areas in Gila County from the area that would retain the 520 NPA. In addition, the 520 NPA  
27 as represented in the Industry split alternative would be expanded to include the remaining rate areas in Pima  
28 County and all rate areas in Cochise County.

1           8. The Commission held a series of public input hearings around the State in an attempt to garner  
2 input on the public's preference with respect to the recommended all-services overlay as well as the proposed  
3 split option which had been considered by the Industry. During the months of October and November 2000,  
4 public input hearings were held in Kingman, Tucson, Flagstaff and Prescott.

5 **B. Related Federal Proceedings**

6           9. On December 23, 1999, the Arizona Corporation Commission ("Commission") petitioned the  
7 Federal Communications Commission ("FCC") for "Expedited Delegation of Authority to Implement Number  
8 Conservation Measures." The Commission requested additional authority to: (1) implement mandatory  
9 thousands-block number pooling; (2) ensure efficient number use practices such as fill rates or sequential  
10 number assignment; (3) establish interim mandatory number utilization data reporting and forecasting  
11 requirements; (4) establish auditing procedures and implement random audits; (5) require the return of unused  
12 NXX codes (prefixes) by carriers to the code administrator; and (6) require the return of unused or under-  
13 utilized portions of NXX codes to the Pooling Administrator when one is selected.

14           10. On May 1, 2000, the Commission filed with the FCC a supplement to its Petition for Delegated  
15 Authority pursuant to paragraph 170 of the FCC's Numbering Resource Optimization Order (CC Docket  
16 No. 99-200).

17           11. On July 20, 2000, the FCC addressed the Delegation of Authority petitions of Arizona and  
18 several other states (In the Matter of Numbering Resource Optimization, et. al., Docket No. 99-200 et. al.,  
19 Order [rel. July 20, 2000]). The FCC conditionally granted Arizona the authority to conduct audits of  
20 carriers' use of numbering resources and the authority to institute thousands-block number pooling in the 480,  
21 520, 602 and 623 NPAs. Other aspects of the Commission's Petition were not ruled upon because the  
22 FCC, in the Number Resource Optimization Order, had already addressed those specific numbering resource  
23 optimization measures.

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27 **II. RELIEF ALTERNATIVES**

28 **A. The "Geographic Split"**

12. A "Geographic Split" involves splitting the affected area into two separate NPA codes. Under this relief method, the geographic significance of area codes is retained since it divides the original area code and geography into two separate area codes and geographies.

13. The customers in the old area code are least affected since they retain the same 10-digit telephone number. Subscribers in the second area code keep the last 7-digits of their existing telephone number but have a new area code.

14. Under the Geographic Split, 7-digit dialing for local calling would continue within each NPA; however, 10-digit dialing would be required between NPAs or area codes.

### **B. The "Overlay"**

15. With the "Overlay" method of relief, the new NPA or area code would be "overlaid" on top of the existing 520 area code. This means that all existing customers would keep their current 10-digit telephone number with the 520 area code. As NXXs in the overlay code are assigned to carriers, most new customers and other new service requests would receive telephone numbers in the new NPA. This is what is commonly referred to as an "all services overlay".

16. Under existing FCC rules and regulations, implementation of an Overlay is subject to the following conditions:

- a. Mandatory 10-digit dialing for all local telephone calls in the future in the affected area regardless of whether the calls are within or between NPAs.
- b. Provision of at least one central office code from the existing NPA to all service providers who have been authorized to provide telecommunications services 90 days prior to the introduction of the new area code.

## **III. POSITION OF INTERESTED PARTIES AND AFFECTED CARRIERS**

### **A. Affected Carriers**

17. Of the affected carriers who have filed written comments, AT&T, Cox and WorldCom supported a geographic split. However AT&T stated that while its preference was a geographic split it would also support an overlay subject to certain conditions. Citizens, Mohave Wireless and Qwest supported an all-services overlay.

18. The positions taken by those commenters favoring an all-services overlay may be generally summarized by the following:

- a. Allows existing customers to keep their current ten-digit telephone number.
- b. Cellular customers are not required to have their handsets reprogrammed.
- c. Least cost for both customers and rural service providers.
- d. Future area codes can be added without customers having to make any more changes.
- e. Does not require customers who were required to take a number change in 1995 to be subject to another.

19. The positions taken by those commenters **not** in favor an all-services overlay may be generally summarized by the following:

- a. Requires the loss of all seven-digit local dialing.
- b. Lose ability to associate an area code with a unique geographic area.
- c. Consumer confusion may arise from different area codes being assigned in the same home, business or neighborhood.
- d. May not alleviate the cost to customers for such things as revisions to advertising, stationary or other material containing a seven-digit telephone number, reprogramming equipment with automatic dialers or revisions to PBX systems.
- e. Can negatively impact entry into the market place by competitive local exchange carriers.

20. Additional positions taken by those commenters favoring a geographic split may be generally summarized by the following:

- a. A split is competitively neutral with respect to telecommunications providers.
- b. Many consumer surveys indicate a customer preference for geographic splits versus all service overlays.
- c. Most widely accepted method of NPA relief.
- d. The very large geographic area is conducive to a split.
- e. Rural areas would not be required to implement mandatory ten-digit local dialing prior to urban areas.

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2 21. Additional positions taken by those commenters **not** in favor of a geographic split may be  
3 generally summarized by the following:

- 4 a. A geographic split is a less permanent solution.  
5 b. Future relief may be more readily accomplished through additional overlays.

6 22. Unlike wireline phones, wireless phones need to be physically reprogrammed to accommodate  
7 a change in area code. Grandfathering of wireless codes, in the event of a geographic split, is an option that  
8 can mitigate the burden to customers and wireless service providers of reprogramming phones. The Industry  
9 Petition is silent on a recommendation. However, examination of the minutes of the Industry September 27,  
10 1999 meeting reveals varying positions concerning the issue. Among the comments expressed were that the  
11 Commission might allow grandfathering, that limited grandfathering for specific NXXs was allowed when  
12 NPA 602 relief was addressed and that at least one wireless provider was not in favor of any grandfathering  
13 because it requires ten-digit dialing between wireline and wireless phones in the same service area. Finally,  
14 one wireless service provider, in its comments, requested that the option to grandfather codes be allowed  
15 subject to a condition that duplication of any grandfathered codes would not be requested in the new NPA.

16 **B. Public Comment Meetings**

17 23. The Commission held a series of public comment meetings around the State at locations within  
18 the 520 area code in an attempt to garner input on the public's preference with respect to the relief options  
19 under consideration. During the months of October and November 2000, public comment meetings were  
20 held in the cities of Kingman, Tucson, Flagstaff and Prescott. Because attendance was relatively light, the  
21 meetings did not provide much insight into which relief method the public preferred. Of the customers present  
22 at the meetings, opinion was somewhat more favorable toward the "geographic split" method of relief than the  
23 "overlay" method.

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27 24. A relatively small number of written public comments have been sent to the Commission for  
28 consideration as part of this proceeding. In general, residential customers favored a "geographic split" as the

1 relief method while business customers favored an "overlay". Several commenters expressed the belief that  
2 splitting into more than two NPAs would be advantageous.

3 25. In addition, several customers have provided opinions via telephone calls to the Commission's  
4 Consumer Services Division. For these customers, the majority were in favor of a "geographic split" as the  
5 relief method.

6 **IV. RELIEF OBJECTIVE OR GOALS**

7 26. In examining this issue, the Commission must weigh the importance of a variety of factors that  
8 affect all or a portion of the telecommunications users in the 520 area code. Compounding the difficulty of  
9 this task is the knowledge that regardless of the plan chosen, all of the options include attributes that both  
10 consumers and the industry may find confusing, disruptive or objectionable.

11 27. The following four considerations or objectives are either identified in Industry guidelines or  
12 FCC Orders on NPA exhaust, and thus it is important that the Commission consider them in making its  
13 decision. First, the plan selected should maximize the time frame before another disruptive NPA relief action  
14 is necessary. Second, the relief method selected should be competitively neutral. Third, the plan should  
15 minimize the total costs to all affected parties. Fourth, the relief option chosen should be the least confusing  
16 and disruptive to customers and take into account customer preferences.

17 **A. Maximize Time Before Additional Relief Is Required**

18 28. A common concern, and one expressed in public comments, relates to the relief planning  
19 process in general and the length of the relief period for the selected method. It is important to try to avoid  
20 another exhaust situation for as long as possible because of the disruption and confusion to the public caused  
21 by changes in telephone numbers.

22 29. NANPA Code relief guidelines recommend that proposed relief alternatives shall cover a  
23 period of at least five years beyond the predicted date of exhaust, that customers who undergo number  
24 changes not be required to change again for a period of eight to ten years and that, in the case  
25 . . .  
26 of splits, all of the codes shall exhaust about the same time. Both of the alternatives considered prior to the  
27 Industry consensus decision were consistent with this criteria.

28 Split Life Expectancy: 520 NPA - approximately 159 months

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Decision No.



1 "overlay". This is because the "geographic split" method provides a pool of new NXXs in each NPA giving  
2 new service providers access to those codes on an equal basis with the incumbent carrier.

3 C. **Minimizes Costs to Both Consumers and the Industry**

4 36. Either method of NPA relief comes with a price tag to Industry and consumers. With a  
5 "geographic split", costs will be incurred by approximately 40 to 50 percent of the existing 520 customers to  
6 change their current NPA to the new NPA. The costs to business will include changing vehicle markings,  
7 stationery and other printed material, promotional materials, and anything else that displays a company's  
8 telephone number. Other costs that may be incurred would include reprogramming of customer premises  
9 equipment, cellular telephones and alarm systems. Both residential and business customers would have to  
10 notify clients, friends and family of their new NPA. Any future NPA "geographic splits" would result in similar  
11 costs every time additional relief is required.

12 37. On the other hand, there are also substantial costs associated with an "overlay". Businesses,  
13 where they are not already doing so, will bear the costs of printing all 10-digits of their number on stationery,  
14 vehicles, promotional material and anything else that displays the company's telephone number. All telephone  
15 systems, alarm systems and customer premises equipment will have to be reprogrammed to accommodate  
16 mandatory 10-digit local dialing. Both residence and business customers would have to revise speed-call lists  
17 with the full 10-digits of a telephone number contained in the lists.

18 38. Both relief methods will also require changes in central office switch databases, dialing plans  
19 and routing translations. Substantial direct and indirect costs, to Industry and consumers alike, will be incurred  
20 under either the "geographic split" or the "overlay" relief method. While the Industry did not submit any  
21 specific cost data for either a "geographic split" or an "overlay" (Citizens Utilities estimated the average cost  
22 of a "split" at \$35,000 per central office and \$2.00 per directory number), Staff believes that, in the long run,  
23 the "overlay" may offer a cost advantage because Industry area code relief activity is minimized and fewer  
24 customers may have to incur costs.

25 D. **Minimizes Confusion and Disruption to Customers**

26 39. The final factor relates to the adverse impacts upon consumers under both relief methods. The  
27 impact upon customers is perhaps the single most important factor that the Commission must consider when  
28 making its decision. The disruption and confusion caused by changes in telephone numbers affect not only

1 customers located in the current 520 NPA, but these changes also affect callers in other parts of the state and  
2 country who place calls to the affected area. Neither the "geographic split" nor the "overlay" will be  
3 completely transparent.

4 40. Examination of the record reveals that both methods of relief have advantages and  
5 disadvantages as far as their impact on both end-users and telecommunications providers. The "geographic  
6 split" has been in existence longer and has been successfully implemented in many metropolitan and rural  
7 areas. Residential customers, in particular, appear to prefer the "geographic split" for a variety of reasons.  
8 However, "overlays" have become increasingly popular in some areas of the country. Staff believes overlays  
9 may be better suited in metropolitan areas where the geographic area effected is relatively small.

10 41. A "geographic split" will require between 40 to 50 percent of the existing 520 customers to  
11 change their current telephone numbers. The "overlay does not require any existing customers to change their  
12 telephone numbers, and therefore, avoids this considerable initial disruption to almost half of the customers  
13 in the affected 520 area code.

14 42. The "geographic split" may be less confusing to consumers when one considers that the  
15 geographic identity of area codes remains intact. Thus, if a customer wants to call a friend in Yuma, for  
16 example, he or she should be able to associate that location with a particular area code. Also alleviated is  
17 the potential confusion created by having different area codes in the same neighborhood,

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20 residence or business location. The results of a 1998 Commission poll of subscribers in Maricopa County  
21 affected by the exhaust of the 602 NPA found that of those surveyed, a "geographic split" was favored over  
22 an "overlay" by a 2 to 1 margin.

23 43. From a customer perspective, that alternative "geographic split" method Staff requested be  
24 analyzed may be an attractive option because, to the extent that rate center boundaries allow, it approximates  
25 County lines making it easier to remember what communities are in which NPA.

26 44. Dialing patterns is another concern that is minimized with a "geographic split". Many  
27 commenters believe that retaining 7-digit dialing for local calls lessens confusion for consumers. They also  
28 argue that an "overlay's" mandatory 10-digit dialing for local calls will be particularly difficult for older citizens

1 and children.

2       45. The Commission must attempt to find a reasonable balance for consumers, taking into account  
3 the large geographic area covered by the current 520 area code that includes both rural and urban  
4 communities. Taking all of the above factors into account, it appears a "geographic split" most closely  
5 achieves the balance desired, for the Tucson and outlying area.

6 **V. NUMBER CONSERVATION MEASURES**

7       46. Rate center consolidation was implemented in the Tucson calling area on June 10, 2000. This  
8 will reduce the number of NXX codes new service providers need to compete within that calling area.

9       47. On March 31, 2000, the FCC released an Order (In The Matter of Numbering Resource  
10 Optimization, Docket No. 99-200, ["Number Optimization Order"]) with the stated goals of ensuring that the  
11 limited numbering resources of the North American Number Plan ("NANP") are used efficiently and that all  
12 carriers have the numbering resources they need to compete in the rapidly growing market place. The FCC  
13 adopted a single system for allocating numbers in blocks of 1,000, wherever possible, and establishing a plan  
14 for national rollout of thousands-block number pooling.

15       48. Furthermore, in the Number Optimization Order the FCC adopted administrative and technical  
16 measures that will promote more efficient allocation and use of NANP resources. Among the measures  
17 adopted are:

18 . . .

- 19                   a. A uniform set of categories of numbers for which carriers must report their  
20                   utilization.
- 21                   b. A mandatory utilization data reporting requirement.
- 22                   c. A process that requires carriers to demonstrate that they need numbering  
23                   resources to provide services.
- 24                   d. A utilization threshold framework to increase carrier accountability.
- 25                   e. Numbering resource reclamation requirements to ensure the return of unused  
26                   numbers to the NANP inventory.
- 27                   f. A mandate that carriers fill their need for numbers out of "open" thousands  
28                   blocks before beginning to use numbers from new blocks.

1           49. The FCC continues to develop, adopt and implement a number of strategies to ensure that the  
2 numbering resources of the NANP are used efficiently. It its NRO Second Report and Order (In the Matter  
3 of Number Resource Optimization, et. al., Second Report and Order, et. al., Docket No. 99-200, et. al.,  
4 Released December 29, 2000), the FCC adopted additional measures to promote efficient allocation of  
5 NANP resources which include:

- 6                   a. Establishment of a utilization threshold of 60 percent (increasing to 75 percent  
7                   over three years) that carriers must meet before receiving additional numbering  
8                   resources in a given rate center.
- 9                   b. Not setting a transition period between the time CMRS carriers must implement  
10                  LNP (November 24, 2002) and the time they must participate in mandatory  
11                  number pooling.
- 12                  c. A comprehensive audit program to verify carrier compliance with federal rules  
13                  and orders and industry guidelines.

14           50. Commission Staff requested Industry comment on whether adoption of number pooling, as  
15 defined in the Federal Communication Commission's ("FCC") Order on Number Resource Optimization  
16 (CC Docket No. 99-200) should be incorporated into the Industry recommended relief plan. One  
17 commenter was in favor but provided no substantive support for the recommendation. Other commenters  
18 recommended that number pooling not be included as part of the relief plan. A summary of the reasons given  
19 in support of this position is:

20 . . .

- 21                   a. The FCC has reiterated its position that number conservation measures are not  
22                   to be substituted for timely area code relief.
- 23                   b. The FCC has established a national plan to roll out number pooling in the top  
24                   100 Metropolitan Statistical Areas.
- 25                   c. Number Portability Administrative Center software upgrade (Release 3.0) is  
26                   currently scheduled for the Western Region mid-February 2001.
- 27                   d. A state pooling trial may have higher implementation costs for the Industry and  
28                   will require a state specific cost recovery mechanism.
- e. The selection of a state Pooling Administrator may be superceded by the FCC's

selection of a national Pooling Administrator.

f. Limited benefit can be achieved in an area code at risk for short-term exhaust.

51. In a separate proceeding to be brought before the Commission, implementation of a State number pooling trial prior to the national rollout, and the issues associated with it, will be addressed. However, neither the national rollout of number pooling or implementation of a State number pooling trial, alleviates the necessity for a relief plan for the 520 NPA because it is so close to projected exhaust.

## **VI. IMPLEMENTATION ISSUES**

### **A. Permissive Dialing Periods**

52. Staff notes that a four-month permissive dialing period is the shortest period recommended in the Industry Guidelines. However, implementation of mandatory dialing prior to a traditionally busy holiday season could prove to be detrimental to both business and residential customers. Therefore, Staff recommends that a permissive dialing period commence June 23, 2001, mandatory dialing/recorded announcement begin on January 5, 2002, and activation of the relief area code occur on March 9, 2002.

### **B. Future NXX Code Allocation**

53. On January 3, 2001, Staff requested the NPA Relief Planner for Arizona to determine the quantity of NXX codes available for assignment in the 520 NPA as of December 31, 2000 and the average number of new codes being assigned per month. On that date, there were 101 NXX codes available and NXX code assignments were averaging six codes per month.

54. Staff recommends that NXX code usage be closely monitored, as any spike in usage could make it necessary for NeuStar NANPA, the current NXX code administrator for the 520 NPA, to declare the 520 NPA in jeopardy. A jeopardy situation is serious because it indicates that the forecasted and/or actual demand for NXX codes will exceed the known supply during the planning/implementation interval for NPA relief.

55. In general, during a jeopardy situation the NXX Code Administrator attempts to prevent NXX exhaustion by obtaining Industry consensus on a method of NXX code allocation. If the Industry fails to reach consensus, the Code Administrator would request the Commission to establish an allocation procedure. Staff recommends that the Commission require prior notification to Staff by NANPA before any declaration of jeopardy in the 520 area code and before any new allocation procedure is implemented.

1           **C. Consumer Education**

2           56. Staff recommends that the Commission require the Industry to develop a comprehensive  
3 customer education program similar to the program used in the Phoenix metropolitan area in conjunction with  
4 implementation of the "geographic split" of the 602 NPA.

5           57. Staff believes that customer education is a key element in the successful implementation of a  
6 relief plan. Further, since everyone, including the wireless and new wireline entrants, benefits from the  
7 successful introduction of the new NPA, all service providers should pay a pro-rata share of the customer  
8 education program based on the number of NXX codes they control.

9           **VII. STAFF RECOMMENDATION**

10          58. Upon examination of the Petition for NPA Relief Plan for the 520 NPA filed by Industry, the  
11 Industry consensus recommendation, Industry and public comments and Findings of Fact Nos. 1 through  
12 57, Staff has recommended:

- 13           a. That the Commission adopt a two-way geographic split with the existing 520 rate centers  
14 within Cochise, Pima, Pinal and Santa Cruz counties retaining the 520 NPA. (Ajo, Benson,  
15 Bisbee, Blackwater, Bowie, Casa Blanca, Casa Grande, Cascabel, Coolidge, Douglas,  
16 Elfrida, Eloy, Florence, Hayden, Komatke, Lone Butte, Maricopa Village, Maricopa,  
17 Nogales, Patagonia, Pearce, Portal, Sacaton, San Manuel, San Simon, Santa Rosa,  
18 Sasabe, Sells, Sierra Vista, Stutonic, Sunizona, Superior, Tombstone, Tucson, West San  
19 Simon, Whitlow and Willcox rate centers.) The remaining area would be assigned the new  
20 area code.
- 21           b. That the Commission order that permissive dialing begin on June 23, 2001, mandatory  
22 dialing/recorded announcement begin on January 5, 2002 and activation of the relief area  
23 code occur March 9, 2002.
- 24           c. That the Industry develop a comprehensive customer education program and that a pro-  
25 rata share of the costs of such customer education program be paid by all  
26 telecommunications service providers based upon the number of NXX codes they control.
- 27           d. That wireless service providers be allowed the option to grandfather codes subject to the  
28 condition that duplication of any grandfathered codes would not be requested in the new  
NPA.
- e. That the Commission require prior notification by NANPA to Staff before any declaration  
of jeopardy in the 520 area code and implementation of a new allocation procedure.

**CONCLUSIONS OF LAW**

2           2.     The recitals of Fact and Conclusions of Law set forth above are supported by the record and  
3 are hereby adopted as Findings of Fact and Conclusions of Law.

3. The record in this proceeding supports adoption of a two-way geographic split and Staff Recommendations in Findings of Fact No. 58 are reasonable, fair and equitable and therefore in the public interest.

8            THEREFORE, IT IS ORDERED that the two-way geographic split with the existing 520 rate centers  
9 within Cochise, Pima, Pinal and Santa Cruz counties retaining the 520 NPA is hereby adopted.

10 IT IS FURTHER ORDERED that the permissive dialing shall commence June 23, 2001, mandatory  
11 dialing/recorded announcement begin on January 5, 2002 and activation of the relief code occur March 9,  
12 2002.

13 IT IS FURTHER ORDERED that the Industry develop a comprehensive customer education  
14 program and that the costs of such customer education programs be paid by all telecommunications service  
15 providers based upon the number of NXX codes they control.

16||...

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IT IS FURTHER ORDERED that NANPA provide Staff prior notification of any declaration of jeopardy in the 520 area code and implementation of a new allocation procedure.

20 IT IS FURTHER ORDERED that this Decision become effective immediately.

21

22 BY ORDER OF THE ARIZONA CORPORATION COMMISSION

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24 CHAIRMAN

COMMISSIONER

COMMISSIONER

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IN WITNESS WHEREOF, I, BRIAN C. McNEIL, Executive Secretary of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this \_\_\_\_\_ day of \_\_\_\_\_, 2001.

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BRIAN C. McNEIL  
Executive Secretary

DISSENT: \_\_\_\_\_

DRS:RLB:lh\MAS



SERVICE LIST FOR: GENERIC INVESTIGATION ON INDUSTRY PETITION FOR APPROVAL  
OF AN NPA RELIEF PLAN FOR THE 520 NPA

DOCKET NO. T-00000F-99-0641

Joe Cocke

Senior NPA Relief Planner, Western Region

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Alltel Communications

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Phoenix, AZ 85034

Arch Paging, Inc.

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Denver, CO 80202

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3 177 North Church Street

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5 Tim Rogers

6 CapRock Communications Corp.

7 15601 North Dallas Parkway

Suite 700

8 Dallas, TX 75248

9 CenturyTel Service Group

10 805 Broadway

Vancouver, WA 9860-3277

11 Curt Huttzell, Ph.D.

12 Director, State Government Affairs

13 Citizens Communications

14 9672 South 700 East, Suite 101

Sandy, UT 84070-3555

15 Copper Valley Telephone, Inc.

16 P.O. box 970

17 Willcox, AZ 85644

18 Bradley S. Carroll

19 Cox Communications

1550 west Deer Valley Road

20 Phoenix, AZ 85027

21 Dobson Cellular Systems

22 13439 North Broadway Extension

Oklahoma City, OK 73114

23 Penny Bewick

24 Electric Lightwave Inc.

25 4400 NE 77<sup>th</sup> Avenue

Vancouver, WA 98662

26 Regulatory Contact

27 Eschelon Telecom of Arizona

28 730 Second Avenue South, Suite 410

Minneapolis, MN 55402

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23 3625 Queen Palm Drive  
24 Tampa, FL 33619-1309

25 Level 3 Communications  
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27 Broomfield, CO 80021

28 Thomas F. Dixon  
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3 Thomas Carter  
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6 Kingman, AZ 86401

7 Mountain Telecommunications, Inc.  
8 10190 East McKellips Road  
9 Scottsdale, AZ 85256

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11 Nationwide Paging, Inc.  
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25 Todd Lesser  
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12 San Carlos Apache Telecommunications

13 P.O. Box 158

14 10 Tonto Street

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16 Smith Bagley, Inc. dba Cellular One of NE Arizona

17 1500 South White Mountain Road

18 Show Low, AZ 85901

19 South Central Utah Telephone Association, Inc.

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20 Escalante, UT 84726

21 Donald Low

22 Sprint Communications, L.P.

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24 John Hayes

25 Table Top Telephone Company, Inc.

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